

REMARKS

Claims 2, 6, 8, 12 and 16 are presented for consideration, with Claims 2, 8 and 12 being independent.

The independent claims have been amended to further distinguish Applicant's invention from the cited art. In addition, Claim 16 has been added to provide an additional scope of protection. Non-elected Claims 1, 3-5, 7, 9-11 and 13-15 have been cancelled.

The drawings were objected to for allegedly failing to include the label --Prior Art-- for Figures 1 and 2. In response to this objection, Applicant is concurrently submitting herewith a Submission of Replacement Sheets of Drawings, in which Figures 1 and 2 are labelled as --Prior Art--. Approval of the drawing changes is respectfully requested.

Claims 2, 8, and 12 are objected to for minor informalities. The changes suggested by the Examiner have been incorporated into the amended independent claims.

Claim 12 stands rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. This rejection is based on the claimed functional descriptive material not residing on a computer readable medium. The claim has been amended to overcome the rejection by directing the claimed subject matter to a computer readable medium that stores a program to be executed. Accordingly, reconsideration and withdrawal of the rejection is respectfully requested.

Claims 2, 6, 8, and 12 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Politis (U.S. Patent No. 5,724,494). This rejection is respectfully traversed.

Applicant's invention as set forth in Claim 2 relates to a method for converting a representation of a first image, having a first set of overlapping graphic objects, into a display list representation of a visually equivalent second image, having a second set of non-overlapping graphic objects. The method includes a step for categorizing each graphic object in the first set as being one of (i) a fully visible graphic object, (ii) a partly visible graphic object, and (iii) an invisible graphic object, and a step for defining, in relation to each said fully visible graphic object in the first set, a substantially identical graphic object in the second set. As amended, Claim 2 sets forth a step for defining, in relation to visible regions of each said partly visible graphic object in the first set, one or more non-overlapping graphic objects being visually equivalent to the partly visible graphic object, in the second set. A description of a non-overlapping graphic object is provided, for example, at page 18, lines 7-23, in relation to Figures 4 and 5.

In accordance with Applicant's claimed invention, an inexpensive printing system for high speed printing can be provided.

The Politis patent relates to an image creation method for reducing the number of pixels involved in each compositing operation by narrowing a bounding box. As understood, Politis uses bounding box minimization to find the smallest area of each graphical portion that is needed to make up the final image (column 12, lines 17-23). When part of an object is obstructed by another opaque object, the bounding box of the obstructed object may be reduced or eliminated, depending on the operand (column 14, line 54, through column 15, line 4). As this

process is carried out, objects along an expression syntax tree may be reduced or eliminated, saving processing time (column 14, lines 47-53).

In contrast to Applicant's claimed invention, however, Politis is not read to teach or suggest, among other features, providing a step for defining, in relation to visible regions of each said partly visible graphic object in the first set, one or more non-overlapping graphic objects being visually equivalent to the partly visible graphic object, in the second set. In addressing Claim 2, the Office Action asserts that Politis teaches a method to define an area that corresponds to a partly visible graphic object, citing Figures 30-33 and column 12, line 10, through column 15, line 15. These portions of Politis, however, are merely read to disclose, among other methods, limiting the newly defined graphic object area to the boundaries of the visible regions of the graphic object, but cannot be said to define a non-overlapping graphic object which is visually equivalent to the partly visible graphic object.

It is submitted, therefore, that Politis fails to anticipate or render obvious Applicant's invention as set forth in Claim 2.

Claims 8 and 12 are directed to a apparatus for converting a representation of a first image and a computer program product, respectively, and correspond to Claim 2. These claims have thus also been amended to recite defining one or more non-overlapping graphic objects being visually equivalent to the partly visible graphic object in relation to the visible portions of each of the partly visible graphic objects. Claims 8 and 12 are therefore submitted to be patentable over Snyder for the same reasons discussed above with respect to Claim 2.

Accordingly, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. §102(b) is respectfully requested.

Therefore, it is submitted that Applicant's invention as set forth in independent Claims 2, 8 and 12 is patentable over the cited art. In addition, dependent Claims 6 and 16 set forth additional features of Applicant's invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Scott D. Malpede/

Scott D. Malpede
Attorney for Applicant
Registration No. 32,533

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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